

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

DONALD EUBANKS, et al,	§	
	§	
<i>Plaintiffs</i>	§	
	§	
v.	§	CIVIL ACTION NO. H-05-4149
	§	
UNIVERSITY OF HOUSTON,	§	
<i>Defendant</i>	§	

**MOTION OF LARRY WATTS TO WITHDRAW AS COUNSEL FOR**  
**RICKY RAYMOND**

Comes now Larry Watts 9"Movant"), Plaintiffs' attorney herein, and moves to be permitted to withdraw for Plaintiff, Ricky Raymond; and for cause, movant would show the following:

1. When Plaintiffs' former counsel, Lionel Mills became incapacitated, and this case was dismissed, Movant agreed to represent Plaintiffs on appeal seeking reinstatement, *pro bono*.
2. When the Circuit Court reversed the dismissal and reinstated the case, Movant agreed to represent Plaintiffs herein on a contingency fee basis if Plaintiffs would cooperate.
3. Plaintiff Raymond reportedly is disabled with Bi-Polar Disorder.
4. After discovery was sent by Plaintiffs' counsel, he received an email on December 9, 2008 purportedly from Plaintiff Raymond requesting a meeting between Plaintiffs and Movant.
5. That was the last contact between Movant and Plaintiff Raymond until

Movant received a certified letter on May 15, 2009 from Raymond.

6. Movant has been informed that Raymond has not been in contact with Plaintiffs' Lara and Eubanks, and that they have only been able to speak with his mother, who advised them that he is suffering from his disease and incapacitated.
7. During the course of development of this case, Movant in the presence of Raymond's fellow Plaintiffs, has attempted to telephone Raymond for aid and participation, without result.
8. Raymond has failed either for personal reasons or medical reasons to cooperate with Movant in the prosecution of this case as has been reported to the Court.
9. Movant requests that he be permitted to withdraw as attorney for Plaintiff Raymond, and that Raymond be permitted an opportunity to obtain counsel and respond to Defendant's Motion for Summary Judgment.
10. Further, Movant requests that notice of all matters be sent to Plaintiff Raymond at his last known address,

Mr. Ricky Raymond  
5243 Canterway Drive  
Houston, TX 77048.

11. Further, Movant requests an oral hearing on this matter.
12. It is presumed that Plaintiff Raymond will oppose this Motion.
13. Therefore, for want of cooperation by and or temporary disability of Plaintiff Raymond (if that should be the case), Movant pray that the Court schedule a hearing so that Ricky Raymond may show cause for opposing Movant's motion to withdraw as his attorney herein.

Respectfully submitted,  
WATTS & ASSOCIATES

\_\_\_\_\_  
/S/LW  
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VERIFICATION

\_\_\_\_\_  
I, Larry Watts, verify that the facts stated herein are true and correct to my personal knowledge except for conversations between Plaintiffs and or their family members to which I have not been a party, upon penalty of perjury.

\_\_\_\_\_  
/S/ LW  
Larry Watts

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document has been served on opposing counsel by filing with the clerk's CM/ECF filing system.

\_\_\_\_\_  
/S/ LW  
Larry Watts